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*United States Bankruptcy Court for the District of Delaware*

*In re: FTX Trading Ltd., et al., Debtors*

*Chapter 11*

*Case No. 22-11068 (JTD)*

*Response to Debtors' One Hundred Nineteenth (Non-Substantive) Omnibus Objection to Certain No Liability Proofs of Claim (Customer Claims)*

**Claimant:**

**Name:** Manik Jain

**Claim Number:** 91340

**FTX Account ID:** [REDACTED]

## **I. Introduction**

I, Manik Jain, am submitting this Response to the Debtors' objection to my proof of claim (Claim No. 91340). I respectfully oppose the Debtors' request to disallow and expunge my claim and request that the Court allow my claim in the amount of **\$12,176.9264 USD**.

## **II. Basis for My Claim**

### **1. Account Activity Overview from Account Creation Date to (and including) Nov 11, 2022**

- **Deposits:** Detailed records of these deposits are attached as **Exhibit A (main\_deposits.csv downloaded from the FTX Customer Claims Portal)**. I deposited a total of **17.03988163 Ethereum (ETH)** into my FTX trading account (Account ID [REDACTED]). The above figure is obtained by summing the entries in the **Amount** column of **Exhibit A**.
- **Trades:** Detailed records of all trade are attached as **Exhibit B (main\_trades.csv downloaded from the FTX Customer Claims Portal)**. I executed a series of sell orders totaling 17.039 ETH in the ETH/USD trading pair (sum of entries in Column **Size**). The total proceeds from these sales amounted to \$22,215.1422 USD (sum of entries in Column **Total**), minus fees of \$35.9039864 USD (sum of entries in Column **Fee**), resulting in net sales proceeds of **\$22,179.23821 USD**.
- **Withdrawals:** Withdrawal records are attached as **Exhibit C (main\_withdrawals.csv downloaded from the FTX Customer Claims Portal)**. I performed 5 successful withdrawals amounting to a total of 9999.811814 USDP

(sum of entries with status **Complete** in Column **Amount**) from my FTX account, incurring fees of 2.5 USDP (sum of entries in Column **fee**). The total amount withdrawn was **\$10,002.31181 USD** (given the 1:1 conversion rate of USD to USDP).

- **Outstanding Balance Calculation**

- i. **Net Proceeds from Trades:** \$22,179.23821 USD
- ii. **Total Withdrawals:** \$10,002.31181 USD
- iii. **Outstanding Balance Owed:** \$22,179.23821 USD (from sale of 17.039 ETH) minus \$10,002.31181 USD (withdrawal) = **\$12,176.9264 USD (net remaining in FTX Account)**

- 2. **Supporting Documentation**

- **Exhibit A:** Deposit Records from FTX Customer Claims Portal
- **Exhibit B:** Trade History from FTX Customer Claims Portal
- **Exhibit C:** Withdrawal Records from FTX Customer Claims Portal

**These documents provide detailed evidence of all transactions related to my FTX account and substantiate the outstanding balance owed to me by the Debtors.**

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### **III. Response to the Debtors' Objection**

- 1. **Validity of My Claim**

The Debtors have objected to my claim on the basis of "No Liability," asserting that they have no record or basis for the claim. However, the attached documentation demonstrates that:

- I had an active trading account with FTX.
- I deposited significant assets into the account (**17.03988163 Ethereum (ETH)**).
- I conducted trades resulting in net proceeds (sale of ETH holding and partial withdrawal)
- There remains an outstanding balance owed to me that has not been withdrawn.

- 2. **Prima Facie Validity**

According to the Bankruptcy Code and relevant rules, a properly filed proof of claim with adequate supporting documentation constitutes prima facie evidence of the validity and amount of the claim. My claim includes detailed transaction records supporting the amount asserted.

- 3. **Request for Relief**

I respectfully request that the Court:

- Overrule the Debtors' objection to my claim.
  - Allow my claim in the amount of \$12,176.9264 USD.
  - Grant any other relief the Court deems just and proper.
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#### IV. Conclusion

For the reasons stated above, my claim is valid and supported by comprehensive documentation. I urge the Court to consider the evidence provided and allow my claim in full.

Dated: 11/2/24

Respectfully submitted,



Signature: Manik Jain

#### Certificate of Service

I hereby certify that on 11/2/24, I served a copy of this Response upon the following parties via USPS first-class mail and electronic mail:

1. **Office of the Clerk of the United States Bankruptcy Court for the District of Delaware**

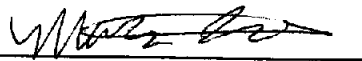
- o 824 Market Street, 3rd Floor, Wilmington, Delaware 19801
  - i. Sent via USPS first-class mail

2. **Sullivan & Cromwell LLP**

- o Attn: Christian P. Jensen ([jensenc@sullcrom.com](mailto:jensenc@sullcrom.com))
  - i. Sent via electronic mail
- o Attn: David M. Rosenthal ([rosenthald@sullcrom.com](mailto:rosenthald@sullcrom.com))
  - i. Sent via electronic mail
- o 125 Broad Street, New York, New York 10004
  - i. Sent via USPS first-class mail

3. **Landis Rath & Cobb LLP**

- o Attn: Adam G. Landis ([landis@lrclaw.com](mailto:landis@lrclaw.com))
  - i. Sent via electronic mail
- o Attn: Kimberly A. Brown ([brown@lrclaw.com](mailto:brown@lrclaw.com))
  - i. Sent via electronic mail
- o 919 Market Street, Suite 1800, Wilmington, Delaware 19801
  - i. Sent via USPS first-class mail



Signature: Manik Jain

#### Attachments:

- **Exhibit A:** Deposit Records obtained from FTX Customer Claims Portal
- **Exhibit B:** Trade History obtained from FTX Customer Claims Portal
- **Exhibit C:** Withdrawal Records obtained from FTX Customer Claims Portal

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**V. Correction of Original Proof of Claim**

I acknowledge that my original Proof of Claim (Claim No. 91340) filed on **February 5, 2024** contained incorrect balance information. The error was unintentional and resulted from a miscalculation due to incomplete records at the time of filing.

In this Response, I have provided the corrected balances and detailed supporting documentation to accurately reflect the outstanding amount owed to me by the Debtors. I respectfully request that the Court accept this Response as an amendment to my original Proof of Claim to correct the inaccuracies.

	Time	Coin	Amount	Status	Additional info	Transaction ID
1327809	2022-11-11T21:37:16.130073+00:00	ETH	7	confirmed		0xd8244f1952fb939d2c294664d6008a53b3542775f3d6602e2b708903d17a1db7
1327792	2022-11-11T21:33:46.131047+00:00	ETH	5	confirmed		0x388443ba08f93d46c5fe4d371ba143d04de744a8e84fd3e9a3aaa00e79aca1dc
1327764	2022-11-11T21:29:45.132409+00:00	ETH	3.5	confirmed		0x98b8baec3b5d10ae794979bd2dda4b9cf979530104144df3d184ff34620fa4ec
1327720	2022-11-11T21:20:45.133186+00:00	ETH	1.5	confirmed		0xefeb90ba8c57365fa23ed1fa0c5e77327dd2e5e49ebe564ad68783892ea493ac
1327679	2022-11-11T21:15:16.129648+00:00	ETH	0.03988163	confirmed		0x84626b0b567170e1f78683c5f15084598ef4486ec5c5f147410f27ef16b5b990

ID	Time	Market	Side	Order Type	Size	Price	Total	Fee	Fee Currency	TWAP
118435887	11/11/2022, 4:43	ETH/USD	sell	Limit	7	1333	9331	18.662	USD	FALSE
118433154	11/11/2022, 4:34	ETH/USD	sell	Limit	5	1488	7440	7.44	USD	FALSE
118432536	11/11/2022, 4:30	ETH/USD	sell	Limit	2.215	1487	3293.705	3.293705	USD	FALSE
118432515	11/11/2022, 4:30	ETH/USD	sell	Limit	0.008	1490	11.92	0.02384	USD	FALSE
118432513	11/11/2022, 4:30	ETH/USD	sell	Limit	0.02	1490	29.8	0.0596	USD	FALSE
118432511	11/11/2022, 4:30	ETH/USD	sell	Limit	1.257	1490	1872.93	3.74586	USD	FALSE
118431790	11/11/2022, 4:25	ETH/USD	sell	Limit	0.693	1399	969.507	0.969507	USD	FALSE
118431788	11/11/2022, 4:25	ETH/USD	sell	Limit	0.016	1399	22.384	0.022384	USD	FALSE
118431786	11/11/2022, 4:25	ETH/USD	sell	Limit	0.008	1399	11.192	0.011192	USD	FALSE
118431784	11/11/2022, 4:25	ETH/USD	sell	Limit	0.011	1399	15.389	0.015389	USD	FALSE
118431780	11/11/2022, 4:25	ETH/USD	sell	Limit	0.06	1399	83.94	0.08394	USD	FALSE
118431772	11/11/2022, 4:25	ETH/USD	sell	Limit	0.355	1399	496.645	0.496645	USD	FALSE
118431755	11/11/2022, 4:25	ETH/USD	sell	Limit	0.008	1399.7	11.1976	0.0223952	USD	FALSE
118431753	11/11/2022, 4:25	ETH/USD	sell	Limit	0.01	1399.8	13.998	0.027996	USD	FALSE
118431751	11/11/2022, 4:25	ETH/USD	sell	Limit	0.01	1399.8	13.998	0.027996	USD	FALSE
118431749	11/11/2022, 4:25	ETH/USD	sell	Limit	0.01	1399.8	13.998	0.027996	USD	FALSE
118431498	11/11/2022, 4:24	ETH/USD	sell	Limit	0.027	1419.6	38.3292	0.0383292	USD	FALSE
118431477	11/11/2022, 4:24	ETH/USD	sell	Limit	0.222	1419.7	315.1734	0.6303468	USD	FALSE
118431475	11/11/2022, 4:24	ETH/USD	sell	Limit	0.008	1423.2	11.3856	0.0227712	USD	FALSE
118431473	11/11/2022, 4:24	ETH/USD	sell	Limit	0.007	1424.5	9.9715	0.019943	USD	FALSE
118431471	11/11/2022, 4:24	ETH/USD	sell	Limit	0.007	1424.5	9.9715	0.019943	USD	FALSE
118431469	11/11/2022, 4:24	ETH/USD	sell	Limit	0.004	1424.5	5.698	0.011396	USD	FALSE
118431397	11/11/2022, 4:23	ETH/USD	sell	Limit	0.007	1436.5	10.0555	0.020111	USD	FALSE
118431395	11/11/2022, 4:23	ETH/USD	sell	Limit	0.03	1444.8	43.344	0.086688	USD	FALSE
118431294	11/11/2022, 4:23	ETH/USD	sell	Limit	0.007	1450	10.15	0.01015	USD	FALSE
118428213	11/11/2022, 4:15	ETH/USD	sell	Market	0.011	1447.2	15.9192	0.0318384	USD	FALSE
118428211	11/11/2022, 4:15	ETH/USD	sell	Market	0.007	1448.5	10.1395	0.020279	USD	FALSE
118428209	11/11/2022, 4:15	ETH/USD	sell	Market	0.014	1469.4	20.5716	0.0411432	USD	FALSE
118428207	11/11/2022, 4:15	ETH/USD	sell	Market	0.007	1471.6	10.3012	0.0206024	USD	FALSE

	Time	Coin	Amount	Destination	Status	Transaction ID	fee
1509510	2022-11-11T21:50:33.809931+00:00	USDP	38	0x9408c666a65F2867A3ef3060766077462f84C717	complete	0x605fc897ee9fcc9706dbb490bcf2a380952e71c4f09e62ed781971a8434da890	0.5
1509259	2022-11-11T21:41:03.354221+00:00	USDP	2600	0x9408c666a65F2867A3ef3060766077462f84C717	complete	0xaa518f383b92368966bf14640c2e33f8ac7c0489550fd73466d1496256950846	0.5
1508972	2022-11-11T21:30:54.696412+00:00	USDP	5201.231995	0x9408c666a65F2867A3ef3060766077462f84C717	complete	0xd754d2c4671d3458d72a52d8ed47ee2b3f72c6d74daebcb04d00881d059ef07c	0.5
1508839	2022-11-11T21:26:40.858354+00:00	USDP	2103.762182	0x9408c666a65F2867A3ef3060766077462f84C717	complete	0x3c05248fe84ef78d2a9b6d569a761afdae7645dad792be77699eaa3168d192da	0.5
1508639	2022-11-11T21:19:39.172376+00:00	USDP	56.817637	0x9408c666a65F2867A3ef3060766077462f84C717	complete	0x19f0c8088e45ba7da4cef84c7e5cebf14af882088e1d5e2e5f3a639efc26fd0a	0.5
1508568	2022-11-11T21:17:26.121148+00:00	USDP	56.817637	0x8e870d67f660d95d5be530380d0ec0bd388289e1	cancelled		0.5

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